



February 15, 2004

Ms. Christy Brown, RCRA Project Manager  
United States EPA, Region 10  
1200 Sixth Avenue, Mail Stop WCM-126  
Seattle, WA 98101

Subject: **February 15, 2004, Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Brown:

This letter provides the February 15, 2004, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from January 15, 2004, to February 15, 2004.

#### **Significant Developments This Period**

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- On February 10, 2004, Baxter began conducting groundwater sampling in accordance with requirements of the Site Investigation (SI), State Waste Discharge Permit (SWDP), and closed wood waste landfill monitoring program. The sampling event includes the three new groundwater monitoring wells.

#### **Anticipated Developments Next Period**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to implement elements of the SI Work Plan, including database compilation and data evaluation.

#### **Anticipated Problems and Problem Resolution**

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

No new problems or issues have been identified at the facility, other than those mentioned in previous progress reports.



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### Other Information

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter is still working with the City of Arlington to obtain the appropriate permits for Stormwater Improvement Measures.
- Baxter will continue excess stormwater treatment in accordance with the approved phased approach for stormwater management.

### Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



Name: RueAnn Thomas  
Title: Environmental Programs Director  
Date: February 13, 2004

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (541) 689-3801.

Sincerely,



RueAnn Thomas  
Environmental Programs Director

cc: Jeanne Tran, Ecology  
Georgia Baxter, J. H. Baxter & Co.  
Mary Larson, J. H. Baxter & Co.  
J. Stephen Barnett, Premier Environmental Services, Inc.

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